BEFORE THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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| IN THE MATTER OF: | ) | |
| | ) | |
| Proposed State Implementation Plan | ) | |
| ("SIP") Revision for the Maintenance | ) | IEPA File #27-96 |
| Plan for the Granite City PM-10 | ) | |
| Nonattainment Area. | ) | |

Hearing conducted at the Harold Brown Recreation Center, Amos & Franklin, Granite City, Illinois, on May 6, 1996.

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APPEARANCES:

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Air Monitoring Section, Bureau of Air
Berkley L. Moore, P.E., Environmental Protection Engineer
Air Quality Planning Section
Jeffrey J. Benbenek, Field Operations, Collinsville
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Jim Henry, Ambient Air Monitoring, Collinsville
Brad Frost, Community Relations Officer, Bureau of Air

HEARING OFFICER WILLIAMS: Let the record show that this is a public hearing before the Illinois Environmental Protection Agency in the matter of Proposed State Implementation Plan, SIP, Revision for the Maintenance Plan for the Granite City PM-10 Nonattainment Area. It's IEPA File Number 27-96. Good morning, ladies and gentlemen. Welcome to this hearing. My name is John Williams and I'm the Hearing Officer for these proceedings. I will introduce the other members of the Illinois Environmental Protection Agency, Illinois EPA, Bureau of Air, BOA, Division of Air Pollution Control staff when they make their presentations. This hearing is being held by the Illinois EPA's Bureau of Air, Division of Air Pollution Control for the purpose of providing an opportunity for the public to understand and comment on the Illinois EPA's proposed State Implementation Plan, SIP, Revision for the Maintenance Plan for the Granite City PM-10 Nonattainment Area. The hearing will be conducted under the provisions of the Agency's Procedures for Informational and Quasi-Legislative Public Hearings, 35 Illinois Administrative Code Part 164. Copies of these procedures can be obtained from me upon request. Any person who wishes to make oral comments, that is, testify, may do so as long as the statements are

relevant to the issues which are to be addressed at the hearing. If you have lengthy comments to make, please submit them to me in writing before the close of the comment period and I will ensure that they are included in the hearing record as exhibits. There are comment forms at the registration table for your convenience if you wish to use these. Otherwise, comments written on standard eight and a half by eleven inch paper will be acceptable. If you have long and lengthy comments, you might want to write your name on the front of the comment form and then attach the comment form to your comments. You may ask questions of anyone who has made oral comments provided that inquiry is firstly framed as a question; second, relevant to the comments; and third, not repetitious. Arguing or dialogue with any speaker or witness instead of questions will not be allowed. Questions will be directed to me, the Hearing Officer, and I will then direct the witness to respond as necessary. Testimony will be limited to ten minutes until everyone has had an opportunity to comment, after which the witnesses will be allowed to speak again. Persons making comments or asking questions will first please state their name and, if applicable, any organization that they represent for the hearing record. For instance, if you wish to just state your

name John Smith, Sierra Club, that's fine. You don't have to say John Smith, Sierra Club every time, just your first name. The Agency will listen to all relevant testimony and will let all relevant documents or data as exhibits into the hearing record. Once the hearing is adjourned today, I will hold the hearing record open until May the 13th, 1996. During this time, all relevant written comments, documents or data will be accepted and entered into the hearing record as exhibits. Please send all written comments, documents or data to my attention as follows. John D. Williams, Hearing Officer, Illinois EPA, 2200 Churchill Road, P. O. Box 19276, Springfield, Illinois, 62794-9276. Written comments need not be notarized as to the facts asserted and should be postmarked on or before midnight, May the 13th, 1996. Copies of the hearing agenda, comment forms and other information are available at the registration area for your convenience. If you have not yet registered at the registration area, please do so now. Anyone who fills out a registration card will receive a copy of the Responsiveness Summary, the Agency's response to public comments, when this document is published. Please check the box on the registration card if you wish to make oral comments. If you wish to make comments but have a time constraint, please let the

Agency staff at the registration table know and I will endeavor to call on you early. You require any further information after this hearing is over, please contact me at telephone number area code (217) 782-5544 or Miss Rachel Doctors at area code (217) 524-3333 and we will be glad to help you. On behalf of Director Mary A. Gade, the Illinois EPA's Bureau of Air, Division of Air Pollution Control staff and myself, I wish to thank you all for attending today and your participation at this hearing. Some people came in after I had started my statement. Will those people -- if you wish to comment or make comments, would you please fill in one of these registration cards. It's not mandatory, but if you wish to testify or comment, we would appreciate it. Also, you'll get a copy of the Responsiveness Summary, will be put on the mailing list for that. Also, there are agenda forms here and other materials here. At this time I'd like to introduce the Agency staff present. First of all, my name's John Williams. I'm with the Division of Legal Counsel. I'm Hearing Officer and I work for Division of Legal Counsel for the Director's office. We have today Mr. Rob Kaleel, Manager Modeling Unit, Bureau of Air. Mr. Kaleel. Next to me is Miss Rachel Doctors. She's Counsel, Division of Legal Counsel and she works for Bureau of Air. She represents

Bureau of Air. We have Mr. Bob Swinford. He's Ambient Air Monitoring, Bureau of Air. Mr. Swinford. We have Mr. Berkley Moore. He's Engineer, Planning Section of Bureau of Air. We have Mr. Jeff Benbenek, Field Operations, Collinsville, Bureau of Air. John Justice. John for -- he's Field Operations, Collinsville, Bureau of Air. Getting a little tongue-tied there. Jim Henry, Ambient Air Monitoring, Collinsville. Jim. Okay. And Mr. Brad Frost who's our Community Relations Officer. He works for the Bureau of Air. He also works for the Director's office and if you have any questions or need any documents or anything like that after the hearing is over, please talk to Mr. Frost and he will take your name and address or endeavor to get those documents for you. At this time I'm going to turn this matter over to Miss Rachel Doctors who will introduce the -- who will introduce the speakers in sequence. Who's the first speaker?

MS. DOCTORS: Mr. Kaleel will make --

HEARING OFFICER WILLIAMS: Okay, Mr. Rob Kaleel. Mr. Kaleel, go ahead.

MR. KALEEL: Hi, my name is Robert Kaleel. I'm the Manager of the Air Quality Modeling Unit in the Division of Air Pollution Control for the Illinois Environmental Protection Agency. The purpose

of today's hearing is to discuss the State's proposed maintenance plan for the Granite City area. This area was designated by the United States Environmental Protection Agency, or USEPA, as nonattainment for particulate matter, PM-10, for the National Ambient Air Quality Standards, NAAQS. The area is now meeting the NAAQS for PM-10. The maintenance plan will ensure that the PM-10 concentrations in the area will continue to meet the NAAQS in the future. Particulate matter is any solid or liquid material other than water which exists in a finely divided form. USEPA has determined that while larger particles in the atmosphere can cause nuisances, it is particulate matter in the PM-10 size range, that is, those particles ten micrometers or less in aerodynamic diameter, that threaten human health and welfare. USEPA and the State of Illinois have promulgated air quality standards for PM-10. There is an annual average standard of fifty micrograms per cubic meter and a twenty-four hour standard of one hundred and fifty micrograms per cubic meter, not to be exceeded more than an average of once per year over a three-year period. These standards are designed to protect the health of even the most susceptible individuals, that is, the very young, the very elderly and those with respiratory diseases. The national standards are set

based on scientific research and human health studies. They include a certain margin of safety and are reviewed periodically by USEPA. Granite City PM-10 nonattainment area was formally designated on November 15th, 1990, by operation of law as not in attainment of the National Ambient Air Quality Standards for PM-10. The designation was made because the Federal Clean Air Act as amended on that date required all areas classified as Group I in the August 7th, 1987, Federal Register to be so designated upon enactment of that act. On April 9th, 1992, the Illinois Pollution Control Board promulgated a set of PM-10 emission limitations and control requirements for sources in the Granite City area. These regulations added additional particulate matter requirements to those that were already in place for industry in Illinois. New regulations which reflected rules that were stricter than the existing Board particulate matter regulations, which also continue to apply, included new emission limits that applied to all process source stack emissions, tighter regulations for dust and other specific rule revisions for a number of sources. The area is now meeting the NAAQS for PM-10. Neither the annual nor the twenty-four hour standards have been exceeded during the past three years in the area for which the maintenance plan has been prepared.

A major contributor to the improvement in PM-10 air quality has been the tightening of the regulations that I referenced earlier. These rules required additional dust control from storage piles, material handling, paved and unpaved roadways and paving of many roadways that were formerly unpaved. The maintenance plan proposed by IEPA includes several provisions. First, the regulations that were tightened to achieve attainment of the PM-10 standards will continue to apply to the industries in the area. This maintenance plan does not relax or loosen the emission limitations that are now in place and these limits will not be relaxed when the area is redesignated to attainment. Second, the Agency will take immediate investigative action should air quality ever reach the level of the standard. In the investigation the Agency will identify the source or sources responsible for the exceedance and then initiate follow-up action. Such further action might consist of requiring stack tests if equipment seems to be operating improperly, taking enforcement action if such continued operating persists or proposing new PM-10 emission limitations to the Pollution Control Board if that were needed. Third, the Agency will continue to inspect sources and enforce the state air pollution control rules, regulations and emission

limitations that are in effect in this area and, finally, PM-10 monitoring equipment will remain in place and air quality will continue to be carefully watched. The maintenance plan is consistent with the provisions of the Clean Air Act and this plan will ensure that the area will continue to meet the National Ambient Air Quality Standards for PM-10 in the future. Mr. Bob Swinford of the Air Monitoring Section will now provide a more detailed discussion of the air quality data for this area.

HEARING OFFICER WILLIAMS: Mr. Swinford.

MR. SWINFORD: Okay, my name is Robert Swinford. I am currently the supervisor of the Data Management Sub-unit in the Air Monitoring Section, Bureau of Air, for the Environmental -- Illinois Environmental Protection Agency. The purpose of my testimony today is to present a summary of PM-10 ambient air monitoring data collected in the Granite City nonattainment area. First slide. The first overhead is a map of the Granite City nonattainment area showing the locations of our existing PM-10 monitoring sites. For reference, the green border is the boundary of the PM-10 nonattainment area.

HEARING OFFICER WILLIAMS: Excuse me. Can everybody see that correctly? Okay, go ahead. Go

ahead.

MR. SWINFORD: There are four PM-10 monitoring sites in Granite City. Three National Air Monitoring Sites located at 15th and Madison, 23rd and Madison and 2044 Washington, those are sites that are known as NAMS and one State and Local Air Monitoring Site located at 2420 Nameoki which is also known as SLAMS. Sampling at 2044 Washington is conducted on an everyday schedule and the other three sites are operated on an every six day schedule. The most recent air quality data, 1993 through 1995, shows that the Granite City area is achieving compliance with both the annual and twenty-four hour air quality standards. This result is depicted in the following figures. First figure is the chart of annual arithmetic means. The first chart shows that the highest annual average of all sites in the area is below the annual standard of fifty micrograms per cubic meter in all three years, 1993 through 1995. During this period of time, the highest mean was 46 micrograms per cubic meter. Thus, the annual standard is being achieved. The second figure shows a chart of the highest twenty-four hour values. In this particular case, it's the highest second high in the area during each year. The second high value is important because since we are allowed three exceedances

during any three-year period, then if all second high values are below the level of the standard, we have achieved compliance. And in this case all three second high values for all three years are well below the level of the standard which is a hundred and fifty micrograms per cubic meter for a twenty-four hour average and thus the twenty-four hour standard is also being achieved. Ambient air monitoring for PM-10 will continue in the Granite City area in the future to verify that air quality levels remain in compliance with the air quality standards. Thank you.

HEARING OFFICER WILLIAMS: All right. That concludes the presentations by the Air Pollution Control staff. At this time I'm going to open it up to questions. Now this is questions for the speakers. You'll have an opportunity to comment later on, but these are -- these are questions for the speakers as to what they have just told you. Any questions? Yes, ma'am. Could you state your name and any organization that you represent, please?

MS. ANDRIA: Yes, Kathy Andria. Kathy with a K, A-N-D-R-I-A. I represent SPILL, Stop Polluting Illinois, and I'm with the Madison County Conservation Alliance.

HEARING OFFICER WILLIAMS: Okay.

MS. ANDRIA: I wanted to -- my first question is why are you changing the status?

MR. KALEEL: We are changing the status -- the attainment designation itself is an administrative tool that is used to indicate areas where further planning, further regulatory development is needed. The Clean Air Act compels us to move areas that have been designated nonattainment to attainment at a specified time frame and in this case the attainment date for this area was 1994. We've achieved that target. Further planning requirements are not needed for this area at this time and that is the reason why we're moving ahead with it. We've achieved the target and it's time to change the designation.

MS. ANDRIA: Has any reporting for 1996 changed the status? Have there been violations reported in 1996?

MR. KALEEL: I guess I would refer that question to Bob Swinford of the Monitoring Section.

MR. SWINFORD: As far as on a twenty-four hour basis, we have not had any values over one fifty thus far in 1996. Of course the annual basis we won't know until the end of the year, but it doesn't appear that that at this point is a problem.

MS. ANDRIA: What happens if you don't

change the status now? If you don't make it nonattainment now?

MR. KALEEL: There aren't --

MS. ANDRIA: -- I mean if you don't make it attainment now.

MR. KALEEL: Well, there aren't any specific penalties if that's what you're referring to if we don't redesignate. If we were not to achieve attainment, then there are sanctions and other penalties that are provided by the Clean Air Act. Since we have reached attainment, those sanctions will not apply and those penalties will not apply.

MS. ANDRIA: How does it affect the area to be attainment? What -- how does it affect the industries that are already here and how does it affect industries that are yet to come?

MR. KALEEL: There are some requirements or some changes in the requirements for permitting that would be affected by the attainment designation. It's not at all clear that the differences in the program for attainment areas versus nonattainment areas is looser or tighter, but it is a different program. The program that is used to permit new sources or modifications to existing sources under a nonattainment area designation is called the New Source Review Program. For attainment

areas the program is called Prevention of Significant Deterioration or PSD. In other words, they're -- it's just different requirements that new sources would have to demonstrate.

MS. ANDRIA: So that new sources then would not -- if this is achieved, if attainment is achieved, new source would not have to produce offsets and have credits or whatever?

MR. KALEEL: That's right. That's one of the features of the New Source Review Program is the offset requirement and that is not applicable in the case of PSD.

MS. ANDRIA: Does this application -- I mean the timing of this now have anything to do with proposed Conagra plant that is -- that the local people are trying to bring in?

MR. KALEEL: Has no linkage to any specific permits in the area or any proposed permits.

MS. ANDRIA: Has -- who has requested -- has anyone requested that this change take place now?

MR. KALEEL: No. This is strictly an Agency initiative.

MS. ANDRIA: Is -- have you -- how have you taken into effect the fact that you've granted a variance recently to Spectrulite which would affect

particulate and the expansion of Granite City Steel?

MS. DOCTORS: The variance is actually -- it's part of the rule, the recent rule, so that's going to be submitted. The rule -- the variance was prior to the new rule we did, R 96.5 and it's included in the rule and the Granite City expansion is also taken into account in the rule and they actually requested some different limits, so there -- it is totally accounted for prior to this change.

MS. ANDRIA: It's accounted for in the rule. How is it accounted for in the data that you've used to state that it's going to remain in compliance and attainment?

MR. KALEEL: Part of our requirement in terms of being able to demonstrate attainment to USEPA is to perform not just the ambient air monitoring that we discussed, but also detailed air quality modeling assessment, and we have performed that assessment prior to going to the Pollution Control Board in 1991 when we developed our original plan for the area and we have verified continued attainment using the same modeling techniques for the projects that you referenced, so those were accounted for in our attainment plan.

MS. ANDRIA: You mentioned, I think, that PM-10 is -- this was designed, the things that threaten

human health and welfare and designed to protect the health of even the most vulnerable of the people. How have you -- have you done any research about the local population, anything that shows that in addition to your material that says that PM-10 has subsided, that the health effects that are caused by PM-10 have also subsided?

MR. KALEEL: We have not done any specific health studies of that nature.

HEARING OFFICER WILLIAMS: Miss Andria, you've been asking a lot of questions.

MS. ANDRIA: Okay.

HEARING OFFICER WILLIAMS: And have you got more questions here because I'm going to allow --

MS. ANDRIA: -- I'll finish at the end. That's okay. Let's go to someone else.

HEARING OFFICER WILLIAMS: Okay, we'll see if somebody else has questions now. Does anybody else got questions for these speakers? Yes, sir, could you state your name and who you represent for the record, please?

MR. BIENIECKI: My name is Henry Bieniecki, B-I-E-N-I-E-C-K-I. I represent the Piasa Palisade Group of the Illinois Sierra Club.

HEARING OFFICER WILLIAMS: Go ahead,

sir.

MR. BIENIECKI: I would like to ask how many square miles are in this nonattainment area?

MR. KALEEL: I don't recall specifically. I think the map that we showed a moment ago shows the outlines of the nonattainment area. It includes all of the city of Granite City and the township, Nameoki Township, but I don't know exactly how many square miles we're talking about. Maybe we could put that --

MR. BIENIECKI: -- Looked kind of small to me.

MR. KALEEL: Okay, the nonattainment area is the area bordered in green there on that map.

MR. BIENIECKI: I would say that is Granite City Township only. It does not include --

MS. ANDRIA: -- It includes part of Nameoki Township.

MR. BIENIECKI: Hmm?

MS. ANDRIA: It includes part of Nameoki Township.

MR. BIENIECKI: The southern part?

MS. ANDRIA: Right there along Horseshoe Lake and that's --

MR. KALEEL: -- The formal designation of

the nonattainment area is also all of Nameoki Township, so if there is some inaccuracies in the map, that wasn't intended.

MR. BIENIECKI: It includes all of Nameoki Township?

MR. KALEEL: Yes, including the city of Granite City.

MR. BIENIECKI: Nameoki Township also all of Venice and Madison?

MS. ANDRIA: That's Venice Township.

MR. BIENIECKI: Huh?

MS. ANDRIA: That's Venice Township.

MR. BIENIECKI: Okay, sorry. I'm confused. Okay, how is this boundary set, I'd like to ask? How do you establish the boundary for this nonattainment area?

MR. KALEEL: The boundary was set trying to use commonly available or commonly understood political boundaries. It was originally intended to encompass the study area that we defined for PM-10 which looked at the major industrial portions of Granite City.

MR. BIENIECKI: I was once chairman, I guess for about ten years, of the Granite City -- the now defunct Granite City Air Pollution Control Board.

As I recall, most of our problems in Granite City with respect to particulates centered around one monitoring station that was at 20th and Omaha. I don't recall, perhaps Jim Henry may know whether that was a state station or the city station. I think it started out as a city station set up by a consulting engineer that the city hired at that time and it was maintained from then forward and apparently disappeared in recent years. The house that it was mounted on, apparently the property was bought by Granite City Steel and the house has been removed as have most of those in that neighborhood and I understood that a monitoring station would be established there last time I was in conversation with someone, but I see now that there is a new station at 20 -- roughly 21st and Washington. I'm not sure what that -- if that 2044 address -- I'm not sure how far east that goes on Washington, but my question is that this represents, to me as an engineer, some sort of discontinuity in your data from one period to another. Has there been some accounting for that discontinuity?

MR. KALEEL: What we try to do is obviously put the monitoring -- monitoring equipment at the locations of population exposure and also areas where we expect to record the highest levels in particulate matter in the area. Of course we're subject

to property owners giving us permission to locate equipment there, so we have some limitations in that area, but I would point out that the purpose -- one of the purposes of doing the modeling, the air quality modeling analyses that I described before is to try to fill in the gaps in the monitoring network, be able to look at projected air quality, what types of concentrations would occur in places where we can't locate monitors and in that process of doing the modeling, we've shown that air quality, the air quality standards are protected everywhere in Granite City, not just at the locations of the monitors.

MR. BIENIECKI: Well, my recollection is that the station at 20th and Omaha was frequently two and three times the next highest station. There was always a top station in the whole state of Illinois. Does your air monitoring -- or does your modeling reflect that same relationship with that site?

MR. KALEEL: Yes, it does. We try to project air quality concentrations using the dispersion modeling techniques for locations on the public right of way, the roadways at 20th Street that runs adjacent to the Granite City Steel complex and I think is where this previous monitor was located. We did project air quality concentrations using the model. We did our best

to verify that the model was projecting accurate concentrations and in developing our attainment plan, we projected air quality concentrations that are consistent with our emission limitations in the regulations and we projected that the air quality standards would be protected even at that location.

MR. BIENIECKI: Do you get with a model -- do you get those same levels that existed during that period when that monitoring station existed?

MR. KALEEL: The modeling process is -- there's multiple phases. One of the first things we tried to do with the model was to verify that we could reproduce concentrations of that magnitude in that area, in other words, to make sure that the model was realistic and using the emission rates as we understood them at that time back in the early 1990's when we started this process, we had very good agreement between the model -- model result and the monitors in the area; however, when we test the model in terms of emissions that are consistent with the new regulations and, as I mentioned, new regulations are somewhat stricter than they existed prior to 1991, that the model projected attainment and we've seen attainment since the time that those regulations have been complied with by the industries in the area.

HEARING OFFICER WILLIAMS: I'm going to allow you one more question and then we'll see if some other people -- and we'll allow you, you know, later on you can ask more questions. You got any other questions, sir?

MR. BIENIECKI: Well, I'm not sure that you made it clear to me that you do -- your modeling does show that the station -- if the station at 20th and Omaha existed today, that it would show the same very high levels of particulates that it once did in relation to the other stations.

MR. KALEEL: I'm quite confident that they wouldn't show values as high as they were prior to 1991 based on the fact that significant new regulations were imposed on the industries in the area beginning in 1992 and at about the same time we've noticed that the air quality concentrations in the area have come down significantly and, in fact, are in attainment.

HEARING OFFICER WILLIAMS: Okay. Are there any more questions from members of the public? Yes, Miss Livingston.

MS. LIVINGSTON: You ready for me, John?

HEARING OFFICER WILLIAMS: Yeah, go ahead.

MS. LIVINGSTON: I'm Penny Livingston.

With respect to --

HEARING OFFICER WILLIAMS: -- What is your office at the present moment?

MS. LIVINGSTON: I'm with the St. Clair County State's Attorney's office.

HEARING OFFICER WILLIAMS: Okay.

MS. LIVINGSTON: I do all of their environmental prosecution. With respect to the modeling that you're discussing, did you base the findings in your model on allowables or actual emissions?

MR. KALEEL: The attainment plan that I discussed where we actually tried to project what the emission rates would be from each source in the area, were they to comply with our new regulations, they would represent allowables and generally allowable emissions are higher or overstate what any particular company is doing at any particular time. Obviously if a company is complying with a particular emission limit, they cannot exceed that emission limit and most companies choose to overcomply so that they don't run into a situation where they exceed the limit and are subject to enforcement by the Agency.

MS. LIVINGSTON: Based on your pretty high level of experience, does it make you nervous that the actual emissions are twenty-two percent of the

allowables and you're having the current readings that you are that don't exceed the standards? You feel comfortable with it?

MR. KALEEL: I'm not sure that I'm following the basis of that.

MS. LIVINGSTON: Well, right now we know what the readings are and they don't exceed the twenty-four hour standards and they don't exceed the annual standards, although they come up above forty, towards the fifty mark, and they come up above hundred and ten towards the one fifty mark, but they don't -- they don't exceed obviously based on the data. Does it -- are you comfortable with the fact that while it's not exceeding now, the allowables are significantly higher than the actuals? In your report it says actuals are twenty-two percent of the allowable emissions.

MR. KALEEL: I'm comfortable with the findings there. We have, in fact, projected what the air quality would be if sources in the area were emitting at their allowable, not their actuals, and we've verified that is still consistent with attainment of the standards.

MS. LIVINGSTON: So at their allowables which would be thousands of tons more, you think the standards would still be met?

MR. KALEEL: Yes.

MS. LIVINGSTON: Okay.

MR. KALEEL: I would point out there was an inaccuracy in terms of the specific number that is mentioned in the maintenance plan for the allowable. The allowables in the area are not nearly as high as they are shown in that document. We apologize for that. We will correct that.

MS. LIVINGSTON: So the actuals really are higher than twenty-two percent of the allowables? It would be more like thirty --

MR. KALEEL: -- The actuals that are listed in that document are, I think, our best estimate, but we think that the allowables that are listed in that document are too high.

MS. LIVINGSTON: Would be much lower?

MR. KALEEL: The allowables would be much lower.

MS. LIVINGSTON: That's good.

MR. KALEEL: The argument is still the same. The allowables are higher, significantly higher than the actuals in the area and by modeling allowables, we've projected concentrations that in fact are conservatively high, but the allowable in the area would not in actuality be as high as what we projected with

the model.

MS. LIVINGSTON: Does your fugitive dust plan require record keeping of what the facilities are doing to control their dust?

MR. KALEEL: Yes, it does.

MS. LIVINGSTON: That's good. I had a couple questions for you, Bob. You made a statement that we're allowed three exceedances in a three-year period. Did you mean to say that if we had three exceedances, that would kick us into nonattainment?

MR. SWINFORD: No, we would have to have more than three exceedances at any given site in a three-year period to go into nonattainment situation, so we are allowed three at each site during a three-year period.

MS. LIVINGSTON: So if you had three this year, would you consider that to be more than one in a one-year period and it would kick it into nonattainment?

MR. SWINFORD: No, it would still -- it would make it -- I think make us concerned because then if we measured any in the next two years, that would put us into a nonattainment situation.

MS. LIVINGSTON: Immediately upon the fourth one, you would be nonattainment?

MR. SWINFORD: Yes.

MS. LIVINGSTON: And how would you go about redesignating the area back to nonattainment?

MR. SWINFORD: I think part of the maintenance plan -- I'll answer a different question first, I think. Part of the maintenance plan is to identify these situations before we get to the second and third exceedance and to try to mitigate it by going at the particular source that's causing the problem and therefore what we would hope would happen would be that if we did measure an exceedance early on, that we would be able to find out who the problem is and go into a situation where we could resolve that before it got to a second or a third exceedance. As far as what happens if our best efforts still get us to four in a three-year period, I don't know what the process is for redesignation. I don't know if Rob --

MR. KALEEL: -- I can address that. The -- if we were to hypothetically reach attainment in this area and be designated attainment and we achieved four exceedances or in violation of the standard at that point, either the state or USEPA could initiate a redesignation back to nonattainment for the area.

MS. LIVINGSTON: You'd have to go through hearings and everything else to redesignate it or you

could just administratively redesignate it?

MR. KALEEL: It's done through the Federal Register. It's a federal action, but it could be initiated either by the state or USEPA.

MS. LIVINGSTON: So let's say one of your monitors that exceeds is an every six day monitor, are you immediately on an everyday six day monitor going to consider an exceedance to kick us into the nonattainment?

MR. SWINFORD: Not necessarily because what we are allowed in that circumstance is to within two quarters after that occurs to go to everyday sampling at that location and at that point that one in six does not get multiplied by six if we go ahead and go to everyday sampling and then it would be at an everyday sampling schedule until we demonstrate we either go above the four exceedance or go more than three exceedances or within a year find out that we haven't had any more exceedances, then we could conceivably drop back to every six day, but we would have to go to accelerated sampling at that site.

MS. LIVINGSTON: And the state would pick up the cost at that site?

MR. SWINFORD: Yes.

MS. LIVINGSTON: Can you tell us what

samplers you're using or what reference methods?

MR. SWINFORD: At the three every six day sites, we are using Sierra-Anderson 1200-B manual samplers. At the continuous or everyday sampling site, 2044 Washington, we're using a Greasby-Anderson and I don't know the model number, but it's a beta continuation sampler and they are both --

MS. LIVINGSTON: -- It's an approved method?

MR. SWINFORD: They're both equivalent methods.

MS. LIVINGSTON: Could you tell us about the wind direction frequency table for our monitors here?

MR. SWINFORD: As far as --

MS. LIVINGSTON: As far as what are the wind speeds and wind directions at these monitoring sites?

MR. SWINFORD: Typically in this part of the state the most frequent directions are from southeast to southwest, especially during the summertime, and then in following winter we get a secondary maximum frequency from west to northwest.

MS. LIVINGSTON: So what do we know about the winds, light, heavy, weird?

MR. SWINFORD: This part of the -- St. Louis area is typical of, I guess, mainland United States. It's in an area of very fast moving frontal systems, changeable weather patterns, as everybody knows. Typically the winds are moderately strong. Summertime we get into stagnation periods where we do have light winds for days at a time, but we also get a lot of transition periods where the winds will pick up, so overall I don't think there's anything particularly unusual about the wind patterns in this part of Illinois. It's typical of mid-continent meteorological conditions.

MS. LIVINGSTON: You made a statement about if you did find an exceedance, that you would do an investigation and a follow-up and possibly do stack tests. Did you testify to that, Rob?

MR. KALEEL: Yes, I did.

MS. LIVINGSTON: Okay, and then you said and we would pursue enforcement if it persisted. Do you mean in the sense that if you found a violation and it wasn't -- a violation of the ambient air quality standards and that if it wasn't corrected, that you would search out where noncompliance was with the regs to enforce or did you mean that someone would get a pass on enforcement if they were already in violation and you

knew it?

MR. KALEEL: Well, I didn't mean to imply that anyone would get a pass. What our contingency measures are approaches that if we were to observe elevated concentrations in the area, just at the first exceedance or even a near exceedance, that we would begin an investigation as to what the causes were of the elevated concentrations. If we're to find that the elevated concentrations were due to a particular source being out of compliance with those emission limitations, then we would sit down through our normal enforcement procedures and discuss with the company how to mitigate that problem, how to get it corrected.

MS. LIVINGSTON: Good. That's good. Can you tell us --

HEARING OFFICER WILLIAMS: -- Just one more question and we're going to have to find out if there's other people wish to ask questions. Go ahead.

MS. LIVINGSTON: Could you tell us a little bit about the new controls at your larger sources, like maybe you could start by telling us who are the major contributors to your readings and then maybe just give us a slight rundown on what kind of new controls they put in to reduce from where they used to be so that we know we really did get some actual

reductions to bring about your data?

MR. KALEEL: Well, the most significant sources in this area obviously are related to iron and steelmaking, but there are others. What we have determined through our analyses was that the most significant contributor, most significant operation was traffic on unpaved roads. We call it fugitive dust emissions. They're not specifically related to a process, an industrial process, but more related to just general activity at industrial facilities. Roadways, truck traffic, automotive traffic on unpaved roads and to some extent on paved roads, as well. The types of regulations that we developed to address that require significantly greater fugitive dust control practices. In general, application of dust suppressants on unpaved roads on a specified frequency and also strict enforcement of the application through our fugitive dust control program, our field inspections office would observe the dust levels from vehicles passing at a particular facility and if they exceed a specified amount, specific opacity level, then that would constitute a violation of our regulations.

MS. LIVINGSTON: Opacity level. We're reading opacity off the roadways?

MR. KALEEL: Yes.

MS. LIVINGSTON: Do you have a certain percentage of control that you require?

MR. KALEEL: The percentages vary for different facilities, but at the biggest facilities in this area, it's a five percent opacity and it's, I believe, averaged over a three-minute period.

MS. LIVINGSTON: And then they have to submit a plan that tells how they would achieve that?

MR. KALEEL: Yes.

MS. LIVINGSTON: And you can balance that off against data that you know would achieve that?

MR. KALEEL: Yes.

MS. LIVINGSTON: And then they have to do -- they have to perform that control?

MR. KALEEL: They have to perform the measures that are specified in their fugitive dust plans.

MS. LIVINGSTON: What percentage of fugitives --

HEARING OFFICER WILLIAMS: -- Last question.

MS. LIVINGSTON: Can I follow up on his question -- on his answer? What percentage of fugitive dust do you think is PM-10?

MR. KALEEL: That's a good question. I

don't know specifically what the percentage is. Obviously for fugitive dust sources much of the particulate matter is greater than this ten micron fraction, but I don't know exactly what the fraction would be for an unpaved road, for example. Probably, you know, less than half would be PM-10.

HEARING OFFICER WILLIAMS: Okay. Are there any more questions here from the public? Yes, sir. Could you state your name for the record and who you represent?

MR. ARNOLD: Talking to me? Yes. Name is George Arnold, Madison County Conservation Alliance. I'm puzzled about particulates come into this designated area. Let me ask about the Chemetco plant. That's outside of this area, is that correct, that you had on the map, Chemetco plant?

MR. KALEEL: I guess it's --

MR. BIENIECKI: -- Yes, it's outside.

MR. ARNOLD: Is the area where Chemetco exists, is this nonattainment or is it considered to be attainment?

MR. KALEEL: My understanding is it's in an attainment area.

MR. ARNOLD: Can you tell me what the readings have been recently on the Chemetco -- near the

Chemetco plant in particulates, lead?

MR. KALEEL: I would, I guess, refer to Bob. I don't recall.

MR. SWINFORD: The most recent readings that we have is still the 1995 readings. They have recorded violations of the lead standard in each quarter of 1995.

MR. ARNOLD: Each quarter, yes?

MR. SWINFORD: Right. At one or more sites. I believe it was just one site per quarter, but I think it was different sites during the year.

MR. ARNOLD: Well, now are those exceedances having any relationship to this present consideration? Obviously the wind blows in from the north sometimes.

MR. KALEEL: We have accounted for the transport of particulate matter into the area in what we referred to as background concentration. We've used the monitoring data in the area to project the amount of contribution, if you will, from sources that are located outside the area, as well as other sources in the area that were not explicitly accounted for in the attainment demonstration. Very small sources.

MR. ARNOLD: Have you used the Chemetco information in your --

MR. KALEEL: -- To the extent that Chemetco contributes to the monitors in the area, then they are addressed in that way, yes.

MR. ARNOLD: What's the expected error in your modeling procedure?

MR. KALEEL: I'm not familiar with the term expected error. What are you --

MR. ARNOLD: What accuracy can you guarantee for your results of your modeling?

MR. KALEEL: Historically the modeling results have been characterized in terms of their variation or variance from a particular monitor value and in general the models have been shown to be accurate within plus or minus twenty percent. The key thing about modeling is that in the previous studies that have been done, that the models have been shown to not be biased and biased means is there a tendency of the model to overpredict or is there a tendency of the model to underpredict and the studies that have been performed by numerous groups, including industrial groups, as well as USEPA, have shown that the models are not biased. They may have some variation in terms of their accuracy, but they're just as likely to underpredict as they are to overpredict and what that would say, what that would indicate about our attainment plan is that you can't

judge the values, the variance that I mentioned, the plus or minus twenty percent and assume that the concentrations are underpredicted by that model. In many circumstances they overpredict and other circumstances they underpredict.

MR. ARNOLD: When you do your calculations toward the future and you say you're reasonably sure of the future particulate values, how is this twenty percent related to that? Do you protect the public by at least twenty percent in your calculations?

MR. KALEEL: We haven't built in a margin of error if that's what you're referring to. What our -- what the approach is, the overall approach, the bigger picture is that we projected these concentrations back in 1991 for the time period when industries complied with the then proposed regulations. Looking back on it or after a period of time, the companies in the area have in fact complied and in response to that we've noticed that the concentrations have dropped and in fact the concentrations based on monitoring, not modeling, are below the air quality standards. As I mentioned, we are going to continue to monitor in the area and that ultimately is the proof that we need to be able to say that the area is in attainment, so it is a projection, if you will, using the models, but we use

the monitors to verify that the projection was correct.

MS. LIVINGSTON: I don't know if you caught that, George, but what Rob testified to when I asked him questions was that his model was based on the allowables, not the actuals that are being measured in the monitor and the allowables are significantly higher than the actuals, so there would be your built-in protection in the model.

MR. ARNOLD: Okay.

MS. LIVINGSTON: Sorry, Rob.

MR. KALEEL: Thank you.

HEARING OFFICER WILLIAMS: Okay, are there any more questions from members of the public here? Hold on, sir. Okay, Miss Andria, you get to ask your questions again now. We're trying to spread it around. I don't want anybody to ask too -- I mean go on and on and on. We want to give everybody a chance to ask questions, so we will get back to you if we don't get you now. Go ahead, Miss Andria.

MS. ANDRIA: If you have a twenty percent plus or minus, that takes you -- if you're at 143 or whatever that is, that takes you over the top.

MR. KALEEL: I understand. I guess the point that I was making is that you're just as likely to go back the other way. If we were projecting 140, it

might -- the real value might actually be 130.

MS. ANDRIA: But it might really be 160?

MR. KALEEL: And again the point that I made is what we do before we can even redesignate the area, once we've made these projections, once the companies have complied and we verified that they've complied with the regulations that are consistent with attainment, we have to continue to monitor for a period of three years after that and we've done that and the monitoring is verifying our projections that we are in attainment.

MS. ANDRIA: But your monitoring also does not include the changes that have been allowed from the expansion of Spectrulite and the expansion of Granite City Steel.

MR. KALEEL: I appreciate that and we will continue to monitor.

MS. ANDRIA: And what I'm very concerned about is that the twenty percent over, in view of the fact that USEPA is considering dropping the standard and being even more stringent with PM-5 or I mean I've even heard PM-1 or something, so it seems to me that this is -- that -- and you haven't done health studies to see that there is not a significant risk in this. I mean, twenty percent over would -- I'm starting to make

comments, I'm sorry.

MR. KALEEL: If I could address that, though, the air quality standards themselves are based on health studies. Perhaps not in Granite City per se, but in many locations throughout the world, so the health aspects of the air quality standards are addressed in USEPA's deliberations on how they set the standard itself.

MS. ANDRIA: When were they studied?

MR. KALEEL: The studies that were used to set the PM-10 standards originally and the PM-10 standard, I believe, was set in 1988, the studies were done in the late seventies and early eighties and, in fact, those studies continue to be done and you referenced the current discussions that are going on at the federal level about revising the particulate matter to a finer cut point, something even finer than ten microns. Those are the result of continuing studies that continue to be done to protect human health.

MS. ANDRIA: So that these studies that were done to set the limits have not taken into effect the Douglas Dochtery [ph] studies on PM-10 which were done in like '93, '94, '95?

MR. KALEEL: I'm not familiar with those specific studies, but all the present health studies

that are available to USEPA are being considered by USEPA in their review of the particulate matter standards. I think I mentioned just briefly that USEPA's required by the Clean Air Act to review the air quality standards, not just particulate matter, but all criteria pollutants every five years and they're in the middle right now of looking again at the particulate matter standards and are considering whether or not those standards should be revised.

MS. ANDRIA: Given the fact that you said that the change would allow not having to have New Sources -- have the New Source -- whatever that's called, I can't remember.

MR. KALEEL: The New Source Review Program.

MS. ANDRIA: Right.

MR. KALEEL: Okay.

MS. ANDRIA: That in between the time that USEPA decides that yes, PM-1 is really what should have been the standard, a new plant could be sited or three or four or five. Now people are -- they have to consider jobs, but if you -- if you change this now, then there will be a new plant that can come in and that the people will not be protected against that in the meantime while the scientific data's being sorted out.

MR. KALEEL: If I might talk a little bit about the PSD process. If any new source was to be located in this area, under the Prevention of Significant Deterioration Rules as opposed to New Source Review, if it's considered a major source, one of the requirements, and this is a requirement in PSD that's not in New Source Review, is that that source has to perform an air quality study and that study might involve additional monitoring. It certainly involves additional air quality modeling to show that the new emissions in conjunction with all the existing emissions will not cause violations of the air quality standard.

MS. ANDRIA: Well, what exactly is a major source?

MR. KALEEL: It depends on the source category. For many sources for PSD it's considered major if the potential emissions exceed two hundred fifty tons per year; however, there's a listed group of source categories, there's twenty-eight source categories that are specifically listed in the Code of Federal Register -- Code of Federal Regulations that the threshold is only a hundred tons and that's the same threshold that applies for New Source Review.

MS. ANDRIA: How many facilities do we have here contributing to PM-10?

MR. KALEEL: I don't recall specifically. I believe it's about thirty.

MS. ANDRIA: So this then -- there are thirty sources. How many of them are major?

MR. KALEEL: Well, just a word about my terminology, I guess there's thirty sources which would encompass all emission units at a particular company. A particular steel mill, all the emission units within a steel mill based on our terminology are a source and what I referred to, there are something like thirty sources, companies with many, many individual emission units, probably closer to three hundred emission units at those thirty sources. The terminology's sort of confusing, but -- and I don't recall exactly how many --

MS. ANDRIA: -- Thirty sources meaning facilities and three hundred meaning actual places where it comes out?

MR. KALEEL: Emission points, right.

MS. ANDRIA: Okay.

MR. KALEEL: And I don't know exactly which ones of those are considered major, but my guess is that most of them are.

MS. ANDRIA: Why do we have only one week for public comment?

MR. KALEEL: I can't answer the way the

thing was scheduled. If the -- if you need more time, I think we can talk with you about that.

MS. ANDRIA: I mean, we don't have -- I mean, this is a very serious thing here that you're doing and it seems to me that I think it's not only justified, but it's mandated that you give more time.

MR. KALEEL: We appreciated that and we can talk with you about that.

MS. ANDRIA: You said that the monitor is chosen to indicate the population exposure. The place that you moved it from was lower, significantly lower than the place that it was moved to, so it seems to me that you have accounted for the difference that people will not -- that is not going to be reflective of street dust. The new location.

MR. KALEEL: My guess is that the new location is picking up significant contributions from street dust and industrial dust and anything that would contribute to the total atmospheric loading in the area would be picked up by the monitor.

MS. ANDRIA: Is it protected at all from the street? I mean, how many stories high is it?

MR. KALEEL: I guess I refer to our monitoring staff.

MR. HENRY: It's just one story.

MR. KALEEL: Our siting criteria, though, are very specific in the way we locate monitors that we not be adversely affected by any real micro scale, if you will, if I can use that term, very local scale effects. It's supposed to represent more of a broader area or broader coverage.

MS. ANDRIA: Well, there's -- the one that's located on Nameoki, where exactly is that located?

MR. HENRY: It's Plaza Furniture. It's a business in that area.

MS. ANDRIA: There are -- at the last meeting, the hearing that you had on the expansion of Granite City Steel, I asked if there couldn't be a monitor located near the school, Lake School. Has there been any inquiries into that?

MR. SWINFORD: Not at this point.

MS. ANDRIA: Since there are people living much closer than that furniture store right across from the coke by-products plant and the piles and everything, is there a reason that there is not one closer?

MR. SWINFORD: I guess not really. Back in the days where we were doing PS -- or TSP monitoring, we had much more extensive network and as we evolved to

PM-10, we found out that PM-10 is a more broadly influenced influent than TSP was and therefore the network could easily be taken to smaller numbers yet without loss of specific information. In other words, being right across from the source didn't seem to necessarily make as much difference for PM-10 as it did for TSP, and so there is a possibility that we can always reevaluate the network, but I think we feel that the site on Nameoki is probably representative of most areas at that end of town.

MS. ANDRIA: The people who live just across that highway in that area and the people at the school tell me that there is like always dust, I mean they can go and they can dust five, six, eight, ten times a day and it's always there. What percentage of that would be PM-10 particles?

MR. SWINFORD: I guess I really don't have an estimate of that. My assessment would be it would be less than fifty percent. TSP, the stuff that you end up wiping off would be more the larger particles and the PM-10 are the much smaller that stays in the air much longer and can be more uniform over greater distances and the TSP is going to fall out much closer to the sources and I think within that range that the PM-10 would probably still be fairly consistent

throughout that area where the particulates they're wiping off is probably the bigger particles and more related to TSP fallout.

MS. ANDRIA: So there would be like fifty percent PM-10 and fifty percent TSP?

MR. SWINFORD: That's just a very rough estimate. What we see on ratios -- we're still doing TSP monitoring in the area and what we see on ratios between twenty-four hour averages of PM-10 and TSP are typically in the, say, thirty percent to sixty percent ratio on any given day. I think the average is probably around forty percent in the actual air between ratio of PM-10 to TSP.

MS. LIVINGSTON: What do you mean, forty percent of your TSP is PM-10?

MR. SWINFORD: Is PM-10, right.

MS. ANDRIA: Given that there --

MR. BIENIECKI: -- TSP is total --

MS. ANDRIA: -- Total suspended particulate.

MS. LIVINGSTON: Total suspended particulate.

MR. BIENIECKI: That's the whole bit?

MR. SWINFORD: That's all of it.

MR. BIENIECKI: As far as particulates

go. As far as dusts go.

MS. ANDRIA: Given that there are children going to that school and they're wiping it off, would these children not be breathing part of it, the fifty percent of the --

MR. SWINFORD: -- Unquestionably.

MS. ANDRIA: Why didn't you do studies on health?

MR. SWINFORD: I guess as -- I'm not sure the answer to that. As an agency, we're not really geared up to do the expertise of health. We rely on the USEPA to provide us with the information needed to assess health impacts and then implement those procedures. We could possibly in conjunction with the Illinois Department of Public Health do health effect studies and we have in specific instances in the past, so that would not preclude doing that, but it would probably -- it would be in conjunction with other agencies rather than as Illinois EPA.

MS. ANDRIA: Do you not think that that would be a good idea to do for something this important and its ramifications?

MR. SWINFORD: I guess it -- you know, it's something we should consider and look into. I guess I don't know what type of -- we'd have to look

into scope and what would be involved in it and what, I guess, the whole procedure would -- you know, how that would work, but, you know, certainly something to consider.

MR. KALEEL: It is our position that the air quality standard is protective. That is the purpose of the standard. That's why we have developed our plans. That's why we're monitoring in the area.

MS. ANDRIA: But you haven't made any efforts to find out in actuality if there are not, say, sixty percent of the population with asthma or bronchitis or bronchial asthma or emphysema or cancer or heart disease to find out any of those things that are all the result of PM-10.

MR. KALEEL: I understand. I also understand it's very, very difficult to attribute any specific health problem to any specific pollutant, so that it's very complex, very difficult to do studies of that type and attribute it specifically to a given pollutant.

MS. ANDRIA: Would it be within the scope of your ability to do so to consult local pulmonary specialists and the local -- we have cardiopulmonary specialists right here in Granite City who have a thriving business.

MR. KALEEL: Well, as of right now, I'm not aware there is a state program that would allow us to do that type of a study.

MS. ANDRIA: Does -- is there -- does there not exist within USEPA -- doesn't USEPA have to approve your SIP?

MR. KALEEL: Yes, they do.

MS. ANDRIA: So is there not -- I mean, with CDC or ATSDR, is there not a capacity to do that before redesignating this area?

MR. KALEEL: It isn't a component of what is required for PM-10 in State Implementation Plan, but certainly the capability exists at the federal level, but it isn't a component of our planning requirements.

MS. ANDRIA: How soon do you plan to put this into effect?

MR. KALEEL: There's a federal process that needs to take place. At the point that we've had our public hearing, we would address the comments from this hearing and any other comments that we receive, any written comments in our Responsiveness Summary and provide that information to USEPA, then USEPA has to do their normal rule making, they would have to publicize in the Federal Register, receive comments at the federal level and then take final action, so my guess is it

would take a year.

MS. ANDRIA: And we do have more than one week to comment?

MR. KALEEL: We'll talk with you about that.

MS. ANDRIA: Okay.

MR. KALEEL: I think we can work that out.

MS. ANDRIA: I'll let somebody ask some more questions. I'll be back.

HEARING OFFICER WILLIAMS: Okay, yes, sir.

MR. BIENIECKI: Henry Bieniecki. Could I have the plot back? It strikes me that the station at 15th Street which I gather from reading material that I got in the mail has the highest readings. Does that correlate with wind directions, that that should be the highest reading station?

MS. DOCTORS: Excuse me?

MR. KALEEL: 15th Street. It's sometimes difficult to say that a peak concentration will always occur in conjunction with the predominant wind direction in an area. Given meteorological condition, especially on a short-term basis could be coming from any specific direction in this case perhaps.

MR. BIENIECKI: There aren't average --

MR. KALEEL: On annual averages you typically would expect that, but there's other factors to consider and in particular the locations of the sources near the monitor. If the -- if the biggest sources are to the north of the monitor, then you would expect a northerly wind or wind moving in a southerly direction to be attributed with the highest concentrations. It wouldn't necessarily be the predominant wind for the area. Most frequently occurring winds for the area. It's just the direction that lines up the monitor with the particular source.

MR. BIENIECKI: My experience is that, as you indicated earlier, seemed to me, that the summer winds, warm weather winds were from the southeast and southwest which I think is a fair observation in my experience of seventy years of living in this area and that the winter winds are more westerly and northerly. Either set of those, and my general observations over many years that since BOF's been here, which is like a quarter of a century, that the BOF is a principal player in particulates in this area. Always has been and probably there's a good chance of always continuing to be, but, anyway, BOF doesn't relate to that wind pattern where that 15th Street station? Do you have any

comments on that?

MR. KALEEL: I don't have any real specific comments other than to point out that there are a number of unpaved roads directly to the north of that facility that would also contribute heavily to the loading at that monitor. So it wouldn't just be the effects of the BOF. It would be other effects, as well.

MR. BIENIECKI: Okay, is PM-10 visible to the human eye?

MR. MOORE: An individual particle of PM-10 is not visible to the human eye. If there are sufficient number of PM-10 particles suspended in the atmosphere, there will be an attenuation of vision and hence opacity, but --

MR. KALEEL: -- Haze.

MR. MOORE: A haze, but there -- for example, when you see dust that you wipe off, none of the stuff that you see that you're wiping is PM-10. It's much too big.

MR. BIENIECKI: If it was all PM-10, you wouldn't notice it, is that accurate? If you had a layer of PM-10 on your automobile, you wouldn't know -- you wouldn't see it?

MR. MOORE: Well, if there were enough of

it, you would see something, but you wouldn't be able to differentiate particles.

MR. BIENIECKI: Okay.

MR. MOORE: But particles of that size will not lay on your automobile. They'll be suspended in the air.

MR. BIENIECKI: Floating, okay. Have there been any improvements in BOF emissions that's reflected in the monitoring?

MR. KALEEL: Jeff, are you --

MR. BENBENEK: In the actual emissions, you said? Because last year Granite City Steel put on a new section to their ESP, electrostatic precipitator, which improved the performance of their control equipment from that point -- from that point forward. If I'm -- if that's the question you're asking --

MS. LIVINGSTON: So how many plates do they have in the ESP now?

MR. BENBENEK: Number of plates I can't tell you, but it's now a -- from a section standpoint, there's now eight sections. There used to be just six.

MS. LIVINGSTON: Okay.

MR. BIENIECKI: Was it the control of road dust and fugitive emissions the factor in being able to attain the PM-10 standard?

MR. KALEEL: That in conjunction with certain other reductions at the process sources or the point sources, but mostly it's fugitive dust, yes, improvements of fugitive dust that allowed us to demonstrate attainment.

MR. BIENIECKI: You're not claiming an improvement in BOF emissions?

MR. KALEEL: Well, the main improvement, I think, as Jeff discussed, was an improvement in the precipitator for that source.

MR. BIENIECKI: When did that -- when was that installation, Jeff?

MR. BENBENEK: That was last -- that was last year in mid to the third quarter of '95.

MR. BIENIECKI: That's well after the time that you made this decision that attainment was achieved, so I would gather then, is it correct to say, that --

MR. KALEEL: -- The attainment plan did not require specific further actions on the BOF.

MR. BIENIECKI: Right.

MR. KALEEL: The additional controls, I think, were more associated with the permit, but they were necessary to continue to attain the standard.

MR. BIENIECKI: My recollection is that

the BOF, that the high emissions that were -- that over several decades, over two decades that were associated with the BOF were from random or episodic type of situation, whether they were operational or failures of some kind, I don't know, but the control of fugitive dust, it seems to me, is a more consistent thing. It's associated with automotive operations which are fairly, say, fairly uniform -- not uniform, but fairly consistent everyday type of things where the problems with the BOF, you know, something could go wrong, you just see these big pink clouds that billowed out and covered the area and you're saying that -- what I understand is that the road dust control was sprayings of water and things of that sort covering piles of material, although I haven't seen any of that, I don't know how you handle the piles, but that you're saying that's the big contribution to achieving PM-10. You're not making any claim on the BOF, but it seems to me that the BOF was the thing that drove these high peak values that knocked the area out of attainment. Do you have any comments about that?

MR. KALEEL: Well, I guess my reaction to that is that there isn't any one single source that was causing the problem, that it was a combination of different things and, in fact, the worst problem was, in

fact, fugitive dust and that is how we targeted our State Implementation Plan and our monitoring data suggests that it's working.

MR. BIENIECKI: You said a few moments ago that you think the site at 2044 Washington reflects that fugitive dust problem as did the one at 20th and Omaha, is that accurate?

MR. KALEEL: Don't recall addressing the one at 20th and Omaha. I think it's fair to say that any of the monitors in the area are being affected significantly by fugitive dust throughout the steel making and slag handling operations and in addition to that, just the normal urban road dust on any of the roadways throughout the town.

MR. BIENIECKI: I don't think they do any water spraying up through the town. The place where they got the -- where the water spraying is done is within the -- principally within the fences of the steel company. Fences don't go up into the residential areas.

MR. KALEEL: Well, what I'm saying is that the monitors are picking up everything that's contributing to particulate air quality in the area and certainly mobile sources contribute to that, fuel combustion sources were contributed to that, industrial

operations contributed to that. The monitor doesn't distinguish which particles it's going to capture. It's going to capture all of it and based on our analyses, the most significant source that was causing ongoing problems in this area were the fugitive dust sources, the vehicular traffic primarily at the industrial facilities, but not exclusively.

MS. LIVINGSTON: Did those fugitive dust sources include coal piles or coke piles?

MR. KALEEL: Yes.

MS. LIVINGSTON: And did they include like, say, the BOF's doorway or sources that you now regulate as no VE?

MR. KALEEL: Yes.

MS. LIVINGSTON: Those were considered your fugitives that attributed to the nonattainment before?

MR. KALEEL: The fugitives I'm talking about are more the unpaved roads and piles, loading and unloading operations, things of that nature. The BOF fugitives were considered in the modeling and, in fact, one of the regulations that is now before the Pollution Control Board is significant tightening of the fugitive emissions from the BOF from a thirty percent opacity with equivalent of an eight-minute observational time to

a twenty percent opacity with a three-minute observational time.

MS. LIVINGSTON: Really? But they have continuous monitoring on it? Do they have a continuous monitoring device on it?

MR. KALEEL: Don't believe there is a requirement for continuous opacity monitoring.

MS. LIVINGSTON: Because it's fugitive, so you couldn't?

MR. BENBENEK: Right.

MS. LIVINGSTON: But have it on the stack?

MR. BENBENEK: The stack, yes.

MS. LIVINGSTON: Can you enforce the fugitive dust plan independent of the five percent opacity reading?

MR. KALEEL: Yes, we can.

MS. LIVINGSTON: Cool. Way to go.

MR. KALEEL: Thank you.

MS. LIVINGSTON: Very good. Bob, can you tell us about this -- I'm sorry, go ahead.

HEARING OFFICER WILLIAMS: Excuse me, ma'am. You had the floor actually.

MS. LIVINGSTON: You're too slow.

HEARING OFFICER WILLIAMS: Go ahead,

sir.

MR. BIENIECKI: Does this proceeding have any review by the Illinois Pollution Control Board? Do they have any input into this?

MR. KALEEL: In the maintenance plan, no. The maintenance plan, as I mentioned before, would be sent to USEPA and USEPA would be the final agency to review it and approve it.

MR. BIENIECKI: With respect to this fugitive dust, I'd like to point out that from an ordinary citizen viewpoint, resident viewpoint, I drive through there frequently down 20th Street, 21st Street and it's crossed over by material movers which are probably twenty-five, thirty-ton vehicle with tires that are four or five feet wide and ten or twelve feet in diameter and it raises a lot of dust. It is not in the same league with the vehicles that traverse Washington Avenue around the hospital. I can't imagine how you could compare the fugitive dust problems in the industrial area south of there within the fences of the company and its crossing points. Everything is cinder there for blocks around. The entire surface area of the company of Granite City Steel is either cinders, crushed rock or asphalt paving and its fugitive problems have got to be a lot worse than the ordinary problems in

Granite City or the ordinary problems you'd have in any community. Yet seems to me like you're trying to equate those two. You have any comments on that?

MR. KALEEL: I don't know that I'm trying to equate those or suggest that urban road dust is bad or worse than the road dust that is generated at the steelmaking operations. It is, in fact, those very same vehicles that you described traveling on the cinder roads or the unpaved roads, the very large trucks that are moving materials throughout the steelmaking operation, that's specifically the focus of our fugitive dust program. Those particular sources. And our field engineers will observe the dust that is kicked up by the vehicular traffic, the action of the tires on those roadways and if the dust emanating from those trucks is excessive, that would constitute a violation of our rules.

MR. BIENIECKI: How often do you do that?

MR. KALEEL: I'll refer to our field people.

MR. BENBENEK: Well, when we go out to the facilities and do our normal inspections, we will see if there seems to be a road that's causing a problem or particular source. At that point that would trigger

us to do some formal readings which is how we would have to back up those observations.

MR. BIENIECKI: Ringleman reading?

MR. BENBENEK: No, these would be Method 9. Code of Federal Regulations. This is not Ringleman. And as Rob said, the percent opacity that we're dealing with on the roadways in this area is five percent. That's very stringent. The one difficulty with those is that you'd have to wait for a certain number of vehicles to pass before you could -- before you could get a valid observation. It's an averaging technique that's used in the regulations, but as I say, when we have done our inspections in the past, we've discussed the fugitive programs with the companies involved and if there -- at this point we've not had to do any formal readings of any roadways because, as I said, when we go out, we look and if we see road -- if we were to have seen a roadway that seemed to be a problem, we would have conducted observations from that point forward.

MR. BIENIECKI: How many times do you come to Granite City during a month and at what times of the day do you come?

MR. BENBENEK: Well, normally our hours are 8:30 to 5. I can't give you a specific frequency as

to how many times we're in Granite City. Depending on the time of year, it may be numerous times, numerous times a month when we're in the city. Sometimes in the winter months we don't get out here quite as much.

MS. ANDRIA: As many as how many?

MR. BENBENEK: But we do --

MS. ANDRIA: -- As many as how many in a month?

MR. BENBENEK: I would say some months we're out here in the area at least once a week at times and not just on plant, but in formally off site, as well.

MR. KALEEL: I might add a comment along these lines. In addition to our own inspections of the facilities in the area, as part of the fugitive dust plans that the company's required to submit to us, there's requirements for record keeping. In other words, we want to know how often they're applying chemical dust suppressant on a roadway if that is their compliance methodology that they chose, so if the company has not been applying the chemical dust suppressants at the frequency that they're supposed to, whether or not we've actually observed a problem, that would constitute a violation of our rules, so there is a continuous enforcement capability.

MR. BENBENEK: They have to periodically send us quarter -- they have to send out quarterly and annually reports on their fugitive dust programs, as well.

HEARING OFFICER WILLIAMS: Okay. I'm going to call an adjournment for one hour so everybody can go off and have lunch. It's about five past twelve now. So we will reconvene at one o'clock. I will then take the witnesses who wish to comment starting off with Mr. Bieniecki, Mr. Charles Westelhoff [ph] and Kathy Andria. If anybody else wishes to make comments at that time, maybe they can fill out a card or if they've already filled out a card, let me know. Okay. The hearing is adjourned for one hour.

(Whereupon a recess was taken, after which the following transpired.)

HEARING OFFICER WILLIAMS: Back on the record. At this time I call Mr. Henry Bieniecki. Mr. Bienicki, go ahead, sir.

MR. BIENIECKI: Bieniecki. I don't have any formal comments to present. Most of my earlier testimony covered the specific and technical comment. The general comment I have is that seems to me this is a very important development for this community and that it does not appear to me to be anything urgent about

this procedure. I haven't heard any response to the questions indicating urgency and my feeling is that this should proceed at a judicial sort of pace and the tradition is that the wheels of justice grind slowly. I would like to see this thing grind somewhat more slowly so that the community, that the average person in the community that doesn't stay in touch with these kind of things have more opportunity to be involved. I think that completes my general comment.

HEARING OFFICER WILLIAMS: Thank you very much, Mr. Bieniecki. At this time I'd like to call Miss Kathy Andria. Yeah, Miss Andria, would you like to make a comment, please?

MS. ANDRIA: I'm going to make my comments in writing, but I would like to say that I agree there are so many questions that haven't been answered yet and there seems to be a rush to judgment, to quote some famous recent people, but there seems -- you are all very happy with that the exceedances show that it's not going to exceed -- that you're going to remain attainment. I think the local people are much more concerned with what they see, what they smell, what their health effects are and I was talking to a woman yesterday who was unable to come today because she has her husband -- had to take her husband to the hospital

who has heart disease and emphysema and lives near the plant and she has observed and told me to mention to her -- she will try to submit written comments, but that she's observed several recent, just in the last few weeks, episodes of high smog, high soot, sooty conditions which we are to believe either is fifty percent or ten percent must be PM-10 in there and at a previous -- at the previous Granite City Steel expansion permit hearing, I mentioned to you about the twenty-one young children at a school in Madison, a grade school in Madison that have asthma, that the principal said have asthma. The effects of the -- long-term effects of health could be -- with the older people could be the results of many years of breathing this, but I don't see that you can make a case that since you're saying there's not been -- there has been attainment for three years and that all of the diseases, the asthma, the bronchitis are documented results of PM-10, I think that it's really incumbent upon you to study further in order to protect the health and welfare of the local people and there's no way that these children could be the results of long-term effects. They're grade school children. I was -- had a girl, we had a local parade here on Friday and one of the girls in the parade said she couldn't march unless it rained because she has

asthma and luckily it rained and she could march, but these are the things that the everyday people are dealing with everyday and it's very, very hard. I understand you in Springfield -- I don't think you addressed -- I didn't hear you address the effects of temperature inversions and what we have to deal with in summer and those -- that smog stays in. I mean, it's ozone and VOC's and now we're going to have increased sulfur dioxide which according to your own document says that there is a synergistic effect and that when you breathe sulfur dioxide and ozone together, it's much more damaging to the lungs and given that these are -- that we're living with this expansion of Granite City Steel plant, the expansion of the production of Spectrulite, the possibility of all of the new places that want to come in, I would really hope that you would not rush to judgment on this and that you would take all of the health effects of the people and do a more -- a better, more all-encompassing judgment as to attainment.

HEARING OFFICER WILLIAMS: Thank you, Miss Andria. Are there any other members of the audience here that wish to make comments at this time? Okay. I'd like to address one thing that Miss Andria brought up and that is concerning the closure of the

record. Okay, at the present time the record date is May the 13th, 1996. That was the date that I was requested to close the record on by the Bureau of Air. I've talked with members of the Bureau of Air here and as a consequence, I'm going to extend the hearing record up to and including June the 5th, 1996, for comments. Okay, so everything up till midnight, June the 5th, 1996, I will accept into the record, so if you'd let your people know, anybody and also that lady that you mentioned who's going to send in comments, maybe you could take some comment forms back for her so that she could use those. Okay, at this time there being no more comments, I would ask are there any more questions and I'm sure there are.

MS. ANDRIA: Yes.

HEARING OFFICER WILLIAMS: Miss Andria, do you have any more questions?

MS. ANDRIA: Yes, for the way that it's handled from here, when -- after you go from here, will there be -- will the transcript be available to the public?

HEARING OFFICER WILLIAMS: Upon request.

MS. ANDRIA: And how soon would that be done?

HEARING OFFICER WILLIAMS: Well, the

transcript would take about ten days before, I'm advised, so probably within about two weeks.

MS. ANDRIA: And I spoke with Miss Doctors and she said that -- because there are a number of documents that I would like to examine.

HEARING OFFICER WILLIAMS: All right. If you will be specific as to the documents that you require to examine and then either let her know now or Fax her what --

MS. DOCTORS: -- Yeah, if it's possible, I'll give you my Fax number, I'll state it for the record, it's (217) 524-4710 and it is much easier for me if I get a written list because then I can check off what it is that I have or if I can't get it, I can respond.

MS. ANDRIA: Okay, is this to be in the form of a request or a FOIA request, just --

MS. DOCTORS: Just a letter and if I can get it by Friday. If you get it to me by Friday, I can respond.

MS. ANDRIA: Okay, who's the FOIA officer for Air?

MR. FROST: Betty Ascher or Jan McDow.

MS. ANDRIA: Jan?

MR. FROST: Yeah, you'd probably actually

send it to Jan McDow, M-C-D-O-W.

MS. DOCTORS: Probably should go through me because there is --

MR. FROST: -- You're asking who the FOIA officer is. When it comes to public comments and public notice or public hearings, you don't go through FOIA. You go through me or in this case you can go through --

MS. ANDRIA: -- I meant for documents for like monitoring and enforcement.

MR. FROST: Yeah, as long as it's within the context of the hearing, we can provide that to you outside of the FOIA process because they take a little bit longer. If it's something you want that's outside of the hearing, the contents of the hearing, you know, or doesn't directly relate to the hearing, then you should go through FOIA.

MS. ANDRIA: You have all the fugitive dust plans and --

MS. DOCTORS: I will walk around and talk to the people and get the information you require.

MS. ANDRIA: Okay.

MS. DOCTORS: You know, to the best of my ability.

MS. ANDRIA: Okay. Okay, how many variances have been allowed for facilities in this --

MS. DOCTORS: To the best of my knowledge --

MR. BENBENEK: Just Spectrulite.

MS. DOCTORS: -- just Spectrulite.

MS. ANDRIA: Just Spectrulite. Was Granite -- was American Steel open the full time of the three years that you used to determine that it was attainment?

MR. BENBENEK: I don't know that they were operating full or even near full capacity during the three-year period.

MS. ANDRIA: Because they were closed for several years during that time.

MR. BENBENEK: Yeah, right. Correct.

MS. ANDRIA: So did you take that into effect into your computer modeling?

MR. KALEEL: When we did the computer modeling, we assumed that they were operating at full load and that all the companies were operating at full load.

MS. ANDRIA: And you think Spectrulite's the only one that has a variance?

MS. DOCTORS: For PM-10, yes.

MS. ANDRIA: Okay. How many site specific rule makings have there been promulgated for

facilities here in this area?

MR. KALEEL: For PM-10, I guess I'm not aware of any.

MR. BENBENEK: No.

MR. BIENIECKI: In the attainment area?

MR. KALEEL: In the nonattainment area?

MR. BIENIECKI: Pardon?

MR. KALEEL: In the nonattainment area, that was your question?

MR. BIENIECKI: Right.

MR. KALEEL: Yeah, I guess I'm not aware of any. We can check.

MR. BENBENEK: I mean, the regulations, if you read some of the PM-10 regs that we have, it's obvious that a certain -- some of the regulations were pointed directly towards certain facilities, but as far as anybody that's gotten what we would call a site specific rule, I don't think we've seen any.

MS. ANDRIA: Because I was reading -- how exactly -- and I haven't been able to determine that just from reading, but the document that I showed you, the visible particle emission, Pollution Control Board thing.

MS. DOCTORS: Oh, the second notice?

MS. ANDRIA: Right, what is its -- what

is the status of it and how does it relate to this proceeding?

MS. DOCTORS: Okay, the status of this is it was just approved by the Joint Commission for Administrative Rules, JCAR, which is the second notice with no objection, so the Board -- it should go final -- we should have a final Board order on May 31st. This is not -- this is tangentially related to what we're doing today. This addresses some items that USEPA raised with respect to our attainment demonstration. They did a conditional approval and this addresses some of those items.

MS. ANDRIA: Why was a hearing held in Chicago but not one here?

MS. DOCTORS: I -- that's difficult for me to address because it's the Pollution Control Board that sets the hearing and this is -- this rule had state-wide applicability, so there's two things, but I can't specifically tell you why they chose Chicago. There was -- there were originally two -- there were three hearings set and the first one was set in Chicago and I think the second one was set in Springfield, but there was no request for that second hearing.

MS. ANDRIA: Since it was only Chicago and Granite City that were -- it says that are addressed

in this, I mean, I can't understand why we were not granted a hearing, an opportunity for comment.

MS. DOCTORS: As I said, the Illinois EPA does not schedule or set up the hearings on the rules. That's with the Board and this does -- this says general cleanup items that affect the state, but nothing -- nothing in terms of control requirements except in the Lake Calumet and Granite City areas.

MS. ANDRIA: Is there any way -- I mean, there seems to be things happening other than the public notices that we get notice of. Is there any way we can be informed as to everything that happens environmentally that's going to affect us?

MS. DOCTORS: Mr. Williams has a public notice list and I believe the Illinois Pollution Control Board also has a list where they notify people of hearings if you tell them what you're interested in.

HEARING OFFICER WILLIAMS: All right. I can certainly put you down on our regular public notice list, so you will get notices of all hearings and the --

MR. FROST: -- You're already on my notification list.

HEARING OFFICER WILLIAMS: You're already on a notification list for this particular hearing because we knew that you were an interested person, but

I can put you down on the Agency notification list on a regular basis, so five years from now you can get notices of permit hearings, land -- air, land, water, this is -- this hearing today is an air hearing.

MS. ANDRIA: Right, I understand.

HEARING OFFICER WILLIAMS: So you would get land hearings, water hearings or even public water supply hearings if those are held.

MS. ANDRIA: I would appreciate being put on that list.

HEARING OFFICER WILLIAMS: All right, we'll put you on the list then.

MS. DOCTORS: But for the Board, you have to contact Illinois Pollution Control Board. That's a separate list.

MS. ANDRIA: Right.

HEARING OFFICER WILLIAMS: Right. Completely separate agency.

MS. ANDRIA: Now is there anything that -- any sort of heads up for citizens before it gets to the public notice stage?

MS. DOCTORS: Not unless there's outreach -- when there's, you know, some kind of general outreach, but not usually.

MS. ANDRIA: So, 'cause usually by the

time -- anything in my observation, the years that I've been looking into this, usually by the time it gets to the hearing stage, everything's set in concrete and citizens have little opportunity to affect the outcome. I mean, for instance, here, our last -- the public hearing that you had on the Granite City Steel expansion, I made what I thought was a very reasonable request for a monitor on top of a school that affected young children, yet there's been apparently no one's looked into that and the responsive comments I thought were -- really did not adequately reflect the depth of concern for the health of the community.

HEARING OFFICER WILLIAMS: All right. I think I can address this in a little way. I know that we have -- for each area we have -- we have Community Relations Officers. Mr. Frost happens to be the Community Relation Officer for air and we have them for land and for water and in -- suppose there's a landfill and I know this is completely separate from this present hearing, but I'm just trying to show you how it works. If you have a landfill, quite frequently the community coordinators will go down and if they know that there is a lot of complaints or lot of concern in the area, they'll go down and hold meetings in a particular area and talk with the citizens and get their concerns and

they also have -- before the hearing, they'll list those concerns so the Agency is aware of what they should be addressing at the hearing, so that's quite frequently. Now as far as air is concerned, I -- if we know you have concerns, then it's up to Community Relations perhaps to meet with the citizens prior to the hearing and to determine what their -- what their concerns are.

MS. ANDRIA: The citizens here, and there were several citizens who are here now and who were here earlier and some that couldn't come that were saved by virtue of the -- both the governor's repeal of the Retail Rate Law and our appeal of an incinerator and so, I mean, we managed to keep one of the heavy particulate emitters and a lot of other emissions emitters out by luck, but we want to be able to be at earlier in the process.

HEARING OFFICER WILLIAMS: Yes, ma'am. If you have concerns and things like that, you should perhaps contact your field office and I know if there are any very serious concerns, I'm sure -- I know the field office will pass them on to the appropriate bureau, but I do know that if there are something like -- if there's some permit hearing or -- for land, water, these quite frequently the Community Relations Officers do come out to the area, talk with the citizens

beforehand, determine all what their concerns are and, as I say, this is useful for us because we can then address the concerns at the hearing.

MS. ANDRIA: Citizens can just call when they notice burning of like, for instance, the creosote poles that were burning in Madison?

MR. BENBENEK: Yes.

MS. ANDRIA: Then when they -- or when they go by and there's like a strong sense of napthalene at Granite City Steel, they call and what happens?

MR. BENBENEK: Well, depending on the gist of the complaint, we will investigate however we feel necessary. For the burning we will go out for that and, you know, as I said at the last hearing in December and when you asked the question about an odor, an odor doesn't necessarily mean there is a numerical violation of a limit, so -- but we take down -- each citizen that calls, we take down, register them as a complaint. We do not require anybody to come in in person or write. If they call in, that's adequate for us to register the complaint.

MS. ANDRIA: Do you have -- are there such -- is there such a thing as a portable PM-10 monitor?

MR. SWINFORD: Not that's a reference or

equivalent monitor.

MS. ANDRIA: I'm sorry, I didn't understand.

MR. SWINFORD: Well, a reference or equivalent monitor are those that are established by U.S. Environmental Protection Agency that's data that can be considered interchangeable and can be compared to the air quality standards, so we would want to -- for a survey purpose, one might be able to use a portable monitor. I don't know if one exists, quite frankly, but you could not take the results of that and compare it to the air quality standard and have that information stand up. We would have to then go out with a reference or equivalent monitor to establish whether these values are in fact comparable to the air quality standards or not.

MS. ANDRIA: So that if we noticed for a pattern of a certain company emitting what we can see as visible emissions, then we can't call and say hey, come measure?

MR. SWINFORD: On a longer term basis, that would be something that usually gets worked through the regional office and they usually then determine if they perceive a problem sufficient to go in for a more permanent type of monitoring. Without a portable monitor to go out and just do a survey with, we would

probably not go in on a permanent basis until the regional office had had a chance to look into it and give us feedback that they think that is a possible violation or a possible air quality problem and then we would, you know, take that into consideration in designing our network and possibly putting in another site.

MS. ANDRIA: How does -- how does emissions that look very, very visibly dark that happen on -- after five o'clock on Friday over the weekends, how do they affect the monitoring results?

MR. KALEEL: Our monitoring is -- our monitors operate regardless of the day of the week. There, as Bob had mentioned, one of our monitors operates on a daily basis. That includes Saturday and Sunday and our other monitors are every six day, but that would also include Saturdays or Sundays whenever that is the sixth day in the schedule.

MS. ANDRIA: How often are they read and who reads them?

MR. KALEEL: The -- I probably should refer to Bob on that.

MR. SWINFORD: For one thing, the sample that's taken every sixth day is a twenty-four hour integrated sample, so we are monitoring for the complete

calendar day and since we're on every six day schedule, we do hit all the days of the week over time, so that if there is a weekend versus weekday problem, we'll be able to see that over time. The samples are manually collected. The sampler is visited obviously before the next six day schedule, some time between the two six day schedules and then the sample is taken off and then it's sent to a lab to be weighed and the mass on the filter then and the flow rate of the monitor then determines the mass loading, the micrograms per cubic meter of that particular sample.

MS. ANDRIA: How do you -- I mean and this is -- I'm a naive lay person -- how -- when you're measuring PM-10, what is it -- she said something -- Penny said something about a plate, what exactly is it and what do you measure and what does it look like?

MR. SWINFORD: Okay. The PM-10 manual sampler is -- has a sampling head and then a blower motor that sucks air through a fiber -- or through a quartz fiber filter and the sampling head is designed in such a way that with an airflow of forty cubic feet per minute will pull the PM-10 particles through the filter and the particles that are larger than PM-10 don't make the bins, don't make the turns in the sampling head and therefore it's only the PM-10 part of the air stream

that actually is deposited on the filter. So it's basically the design of the sampler gives us a PM-10 cut.

HEARING OFFICER WILLIAMS: Off the record a minute.

(Whereupon a discussion was held off the record, after which the following transpired.)

HEARING OFFICER WILLIAMS: Back on the record.

MS. ANDRIA: How does the humid air in the summer affect it and also how -- the PM-10 and how does the -- how do rainfall -- how does rainfall affect it?

MR. SWINFORD: In general it doesn't affect it because the flow rate is maintained constant by the monitor itself, so loading doesn't affect it. If we get a lot of heavy loading, in the old samplers it would make changes in the flow rate as the readings got higher and higher, but these particular samplers have equipment that keep the flow rate constant throughout the twenty-four hour time period that it's sampled, so if there is a lot of humidity that might tend to deposit on the filter, that doesn't affect the sampling. As far as the weighing, the filters are equilibrated to fifty percent humidity, I believe, both before on the initial

weight and afterwards when they do the final weighing, so basically it takes it back to a similar set of conditions so that water does not either -- is not interpreted as particulate or a certain amount of dryness does not underpredict what was actually weighed, so we equilibrate the filters both before and after to maintain a constant set of conditions for the weighing process.

MS. ANDRIA: Then is it by volume, by weight when you were talking about the --

MR. SWINFORD: The mass is determined by weight. It's just a difference in weight of this particular filter before and after it was sampled. The volume is determined by flow rate measurement that's taken when the sample is first put on and then when the sample is removed and then that flow rate is corrected to standard conditions and everything is referenced then to standard conditions based on that.

MS. ANDRIA: You said that the wind is generally from the southwest. Where is the nearest -- all of the sites are located south or east of the coke by-products plant and partly of the Granite City -- the blast -- the boiler operation. Where are the nearest ones to the northeast, the nearest PM-10 monitors?

MR. SWINFORD: To the northeast? I

believe the -- the next --

MS. ANDRIA: -- Outside the Granite City area.

MR. SWINFORD: Outside the Granite City area particularly, we have monitors in Wood River, in Alton and in East St. Louis, so we do have monitors on either side of Granite City. Admittedly those are not that close that would really measure a significant impact from Granite City directly emissions. I would point out that the one monitor on Nameoki is the closest one to the coking facility and would be downwind of that under a number of normal conditions during the year.

MS. ANDRIA: But it would still be -- I mean, when you say the wind is from the southwest, doesn't that mean that it comes from the southwest --

MR. SWINFORD: -- Right.

MS. ANDRIA: -- and goes --

MR. SWINFORD: -- I think my point earlier was it's generally from southeast to southwest, so we are measuring a large percentage of winds also from the dead south which would be like a hundred and eighty degrees and then on either side of that direction, so with that monitor being essentially north of the coking plant, we would be fairly frequently downwind of that facility at that particular site.

MS. ANDRIA: The 24th is north -- 24th and Nameoki is north of --

MR. BIENIECKI: Can we have the --

MR. SWINFORD: -- You got that map again? I think it's pretty much north.

MR. BENBENEK: Yes.

MR. SWINFORD: In fact, that site -- the reason that site is on that side of town was essentially for measuring the impact of the coking facility.

MS. ANDRIA: It's pretty much --

MR. SWINFORD: -- It's north.

MS. ANDRIA: It's not very much north. It's almost due west.

MR. BIENIECKI: It looks due north.

MR. SWINFORD: Yeah.

MR. BENBENEK: The coking operations are right here.

MR. BIENIECKI: Yeah, right at the end of Nameoki Road is the facility.

MR. BENBENEK: This is Nameoki here which is due north.

MS. ANDRIA: Okay, 'cause I consider the whole operation and Nameoki Road runs perpendicular into the coking operation.

MR. SWINFORD: Right.

MS. ANDRIA: And there are piles of -- that are -- there's a lot of activity there, there are a lot of trucks coming with stuff not covered that operate north of that, so that's why I'm saying that I -- I don't think there is anything that's reflecting the wind for the people -- I mean, I'm from Granite City and I am concerned about them, but I'm also concerned about what's going beyond if there are no PM-10 monitors. If anybody else has any questions, go ahead.

HEARING OFFICER WILLIAMS: Anybody else got any questions?

MR. ARNOLD: Go ahead.

MR. BIENIECKI: I was going to ask Jeff what his area of responsibility is. Does it cover the entire county?

MR. BENBENEK: Yes.

MR. BIENIECKI: How many sources do you think -- you know how many sources there are?

MR. BENBENEK: Industrial facilities?

MR. BIENIECKI: Not facilities. The emission sources.

MR. BENBENEK: Well, I think in our list -- you mean for county wide?

MR. BIENIECKI: Pardon?

MR. BENBENEK: County wide?

MR. BIENIECKI: County wide, uh-huh.

MR. BENBENEK: County wide, I do not have -- I'm sure it's up in the thousands county wide. If you're talking about permitted emitting emission units.

MR. BIENIECKI: You have to see each one of those sources during the year?

MR. BENBENEK: No, because we -- our -- what we do routinely on an annual basis is it's based on a work plan that's approved by the USEPA and there are certain categories in that work plan that facilities have to fit into before we are required to make a -- what we would call routine annual inspection at, so, no, we don't go to every permitted plant in the county or in any other part of the state. If they happen to fall into a category that's included in some work plan in the future, then we will go to them or if there's a special project that's required by our management or if we get complaints or if we notice a particular problem at a facility, then we don't -- you know, we can go in and make an inspection, but on a routine basis we won't go to all of them. For example, in the Madison County area, I have about fifty facilities that are considered to be what we would call a major facility.

MR. BIENIECKI: And that requires what kind of inspection schedule?

MR. BENBENEK: Well, the inspection schedule is normally on a work plan facility is a once a year. Certain facilities because of their size or complexity we could make additional inspections at and -- but we are not -- you know, we are not tied down to just saying well, once is enough. If we think we need to go more times, we will and that can change on a day-to-day, week-to-week, month-to-month basis.

MR. BIENIECKI: Are the companies subject to these inspections notified beforehand?

MR. BENBENEK: Not at all times. I would say most of the time we do notify because that's our standard -- our standard procedure, but if the situation calls for an unannounced inspection, we will do it.

MR. BIENIECKI: You have any difficulties with access?

MR. BENBENEK: No. None.

MS. ANDRIA: How many people do you think it would take to do your job to adequately inspect them all?

MR. BENBENEK: Well, I mean, I've been the engineer for Madison County for a number of years now and I think for most of those years I've been able to complete my work plan, so I guess on that basis, it's adequate, you know, it's adequate to have one person,

but we also have additional people in our office, as well, that assist me in the Madison County area, so, I mean, I think everybody thinks they need more help.

MR. BIENIECKI: Do you think there's any credence to the common viewpoint in Granite City among residents that on weekends when there's less supervision, for example, in the coke ovens that the employees aren't all that diligent in promptly replacing covers and things of that sort? Maybe I'm out of date, but I know that people feel that things really go to hell on weekends.

MR. BENBENEK: A couple years ago the USEPA adopted a national emission standard for air pollutants under Part 63 of the Federal Regulations. That required that they hire an observer to do topside and door inspections of the coke oven batteries on a daily basis.

MS. ANDRIA: What does that mean?

MR. MOORE: Everyday.

MR. BENBENEK: Everyday.

MS. ANDRIA: Who hires them?

MR. BENBENEK: At the time, since the -- at the time of the rules being adopted, the company was required by the USEPA to hire a representative from a firm to do the inspections or hire a firm to do the

inspections.

MR. BIENIECKI: Is that the case in Granite City?

MR. BENBENEK: Yes. And those inspectors had to meet and be certified under USEPA guidelines to do those types of inspections.

MS. ANDRIA: To whom do they report their results?

MR. BENBENEK: They report the results to -- at this point in time since the Agency now has delegation of authority, I believe for those regulations those reports are coming directly to us. Originally they went to the USEPA and we were copied because, as I said, at that time we didn't have delegation.

MS. ANDRIA: How often do they report?

MR. BENBENEK: A month. Every month. They report on their daily observations.

MS. ANDRIA: And are those inspection reports available to the public?

MR. BENBENEK: The actual -- well, what we get is a summary and I believe that -- right now that's all they're required to report on a monthly basis.

MS. ANDRIA: But they are paid by the companies?

MR. BENBENEK: Yes, at this point in time it's a -- the company pays the contractor to do the work for them.

MS. ANDRIA: Do you know if they're an employee of the company or employees of a contractor?

MR. BENBENEK: They're employees of a contractor.

MR. BIENIECKI: Then is it your judgment that this common viewpoint of residents of Granite City is unsupported?

MR. BENBENEK: I would like for them -- if they have any knowledge of anything that's happening that's untoward, I would appreciate a call.

MR. ARNOLD: Arnold again. This brings up the question of the exceedances in the vicinity of the Chemetco plant. Have those exceedances continued ever since the plant began, do you know?

MR. SWINFORD: I believe during each year since they've done monitoring there have been violations of the lead standard. I do not believe they have been every quarter, but I do believe that during a calendar year there have been at least one quarter of lead violations at that network that they are operating.

MR. ARNOLD: And have they made improvements in their control equipment?

MR. SWINFORD: I don't know that. I'm not that part of the --

MR. ARNOLD: How does a citizen manage to stop that kind of exceedances? How does EPA stop that kind of exceedances? How does it go on and on?

MR. KALEEL: Well, we have been involved and I don't know the specifics of it because I personally am not involved, but I know there have been both state and federal enforcement actions involving Chemetco and there are ongoing negotiations to develop plans for improving the operation of that facility.

MS. ANDRIA: How long has that been going on?

MR. KALEEL: I don't know if John or Jeff have any more --

MR. BENBENEK: First consent order we had with Chemetco was in 1983.

MR. ARNOLD: So exceedances have been going on a long time obviously?

MR. BENBENEK: We've had a number -- we've had the most recent order that was signed was in 1993.

MR. ARNOLD: And still we have exceedances on the record?

MR. BENBENEK: At this point, yes. The

company is installing additional control equipment right now, but the first set of these additional secondary units is not in operation as of yet, but they do have plans to install them on all the -- as secondary or I should say as tertiary controls on all the stacks.

MR. ARNOLD: Do you recognize that there's some inconsistency in having exceedances across the line and then request for non -- request for attainment status on this side of the line while we have continuing questions about health effects of PM-10, do you find inconsistency there?

MR. KALEEL: I guess I don't see an inconsistency where -- you know, the Chemetco facility, it's a very localized problem and we're talking about a different pollutant. We're talking about lead concentrations there and I understand lead is partially particulate, but -- or it is a particulate, but we have a completely different standard for lead separate from particulate matter. What we're talking about today is particulate matter in Granite City.

MR. ARNOLD: Well, if I try to put it in the form of a question, you recognize that the wind blows in all directions and sometimes blows pretty hard and that air pollution can cross the line so fast?

MR. KALEEL: I understand.

HEARING OFFICER WILLIAMS: Any more questions? Any more comments? Now's your chance. Well, actually now is not your chance. We're going to give you another chance. That sounds strange, but on the table here you'll find comment forms, so if anybody wishes to make comments, you may send them in to me, mail them in to me and we have extended the date of the hearing record to remain open until June the 5th, 1996, and all that remains for me now is to thank everybody for coming here and for your questions and concerns and on behalf of the Director, our Director Mary Gade and Bureau of Air staff and myself, thank you for coming. Hearing is now closed.

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